## IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

In re:

Chapter 11

RTI HOLDING COMPANY, LLC, et al.,

Debtors.

Chapter 11

Case No. 20-12456 (JTD)

(Jointly Administered)

## NOTICE OF APPEARANCE AND REQUEST FOR NOTICES AND PAPERS

PLEASE TAKE NOTICE that Michael and Lory Sarlo, Trustees of The Atlantis Trust ("Landlord"), creditor and party-in-interest in the above-captioned cases, hereby appear by their counsel, Connolly Gallagher LLP and Watkins & Eager PLLC, and such counsel hereby enter their appearance pursuant to section 1109(b) of title 11 of the United States Code (the "Bankruptcy Code") and Rule 9010(b) of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules"); and such counsel hereby request, pursuant to Bankruptcy Rules 2002, 3017 and 9007 and sections 342 and 1109(b) of the Bankruptcy Code, that copies of all notices and pleadings given or filed in the above-captioned cases be given and served upon the following persons at the following addresses, including email addresses and telephone number:

Jeffrey C. Wisler, Esquire Kelly M. Conlan, Esquire CONNOLLY GALLAGHER LLP

1201 N. Market Street, 20<sup>th</sup> Floor Wilmington, DE 19801

Telephone: (302) 757-7300

Email: jwisler@connollygallagher.com Email: kconlan@connollygallagher.com

Robert B. Ireland, III, Esquire WATKINS & EAGER PLLC

The Emporium Building 400 East Capitol Street Jackson, MS 39201

Telephone: (601) 965-1829

Email: rireland@watkinseager.com

Case 20-12456-JTD Doc 305 Filed 11/05/20 Page 2 of 4

PLEASE TAKE FURTHER NOTICE that pursuant to section 1109(b) of the Bankruptcy

Code, the foregoing demand includes not only the notices and papers referred to in the

Bankruptcy Rules and sections of the Bankruptcy Code specified above, but also includes,

without limitation, any notice, application, complaint, demand, motion, petition, pleading or

request, whether formal or informal, written or oral, and whether transmitted or conveyed by

mail, delivery, telephone, telegraph, telex or otherwise filed or made with regard to the above-

captioned cases and proceedings related thereto.

This Notice of Appearance and Request for Notices and Papers shall not be deemed or

construed to be a waiver of (a) Landlord's rights (i) to have final orders in non-core matters

entered only after de novo review by a District Judge, (ii) to trial by jury in any proceeding so

triable in these cases or in any case, controversy, or proceeding related to these cases, and (iii) to

have the District Court withdraw the reference in any matter subject to mandatory or

discretionary withdrawal, or (b) any other rights, claims, actions, setoffs, or recoupments to

which Landlord is or may be entitled, in law or in equity, all of which rights, claims, actions,

defenses, setoffs, and recoupments, Landlord expressly reserves.

Dated: November 5, 2020

CONNOLLY GALLAGHER LLP

/s/Kelly M. Conlan

Jeffrey C. Wisler (DE 2795)

Kelly M. Conlan (DE 2795)

1201 N. Market Street, 20th Floor

Wilmington, DE 19801

Telephone: (302) 757-7300

Email: jwisler@connollygallagher.com

Email: kconlan@connollygallagher.com

-and-

2

Robert B. Ireland, III, Esquire WATKINS & EAGER PLLC

The Emporium Building 400 East Capitol Street Jackson, MS 39201

Telephone: (601) 965-1829 Email: rireland@watkinseager.com

Attorneys for Landlord

## **CERTIFICATE OF SERVICE**

I hereby certify that on November 5, 2020, a true and correct copy of the foregoing document was served via email through the CM/ECF system upon the parties registered to receive such service.

/s/ Kelly M. Conlan Kelly M. Conlan (DE 4786)